



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

October 22, 2021

Brian Conners
Operations Lead, East
Chevron Environmental Management Company
1200 State Street
Perth Amboy, New Jersey 08861

Re: Chevron's Response to USEPA's February 22, 2021 Comments, dated June 9, 2021, regarding the Justification for No Further Investigation for Groundwater at PAOC 6, dated June 10, 2020
Former Chevron Perth Amboy Facility
Perth Amboy, Middlesex County, New Jersey
EPA ID #: NJD081982902

Dear Mr. Conners:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of Chevron's response to EPA's February 22, 2021 comments, dated June 9, 2021, regarding the facilities submittal of a Justification for No Further Investigation for Groundwater at PAOC 6, dated June 10, 2020, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, New Jersey. We provided Chevron with draft comments regarding PAOC 6 on March 11, 2021, via email, and discussed these comments in a subsequent conference call on March 30, 2021. This response letter was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C.7:26E. We have the following general and specific comments:

General Comment:

The cross-sections and figures helped illustrate the LNAPL field screening observations. The cross-sections support that there was a release of some type in the vicinity of Area D and Area C that may have been diverted around the AST 326 foundation to Area B and Area E based on the continuity of orange (> 500 ppm PID) and yellow (>100 ppm PID), sheen and LNAPL observations. Based on the cross-sections, the LNAPL impacts described by field screening in PAOC 6 lead ESS areas appear to be contiguous. There were no temporary wells for LNAPL assessment or ground water sampling in the Area C or D areas despite the boring log observations and the highest field screening PID (9999 ppm) concentrations.

Most of the impacted fill above actual or projected peat elevations was excavated during the PAOC 6 lead ESS remediations. The cross-sections show variability in the depth/elevation of the peat-organic sediments. Additional LNAPL impacted materials may remain below excavation limits, and in adjacent pipe-way and AST buffer zones. Information on the AST 326 ring wall foundation was not provided to help assess the potential for LNAPL impacts beneath the AST.

Temporary well sampling in the vicinity of the PAOC 6 lead ESS areas did not represent Area B, C, D or E. Monitor wells in the area are upgradient (P-1) or distant downgradient (MW-261R, MW-267R, MW-551, former MW-117) of the PAOC 6 ESS areas, and ground water flow conditions have some variations (see attached document). AOC 23-41-SWMU 18 monitor wells may be along downgradient flow paths from PAOC 6 ESS areas, but there has been no sampling to assess ground water quality pre- or post-remediation in the impacted PAOC 6 lead ESS areas.

Specific Comments:

1. The Technical Requirements for Site Remediation (TRSR) require remediation of both free and residual NAPL impacts to ground water quality. The PAOC 6 lead ESS IWP investigation did not characterize LNAPL ground water impacts in areas with the highest field screening indications of LNAPL impacts prior to remedial action. Therefore, an assessment of remaining impacts to ground water quality is needed in Area C and Area D that appear to be within a release area, and Area B and Area E that appear to be migration paths around the AST foundation. The results will determine if additional remediation under the HSWA permit or a MNA monitoring plan is needed.
2. Source areas with less than the CMI 100 ug/L benzene action level will require monitoring to evaluate COC trends (increasing, stable, decreasing).

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at vargas.ricardito@epa.gov.

Sincerely,

Ricardito Vargas
Project Manager
Land and Redevelopment Programs Branch

Enclosure

cc: Charles Zielinski, NJDEP (electronic copy only)